



May 11, 2013

**Via Overnight Mail**

Honorable P. Kevin Castel  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: **Alexander Interactive, Inc. v. Adorama, Inc., et.al., 12 cv 6608 (PKC)**  
(the "Action")

Dear Judge Castel:

**MEMO ENDORSED**

As this Court knows, this firm is counsel to the Plaintiffs in the above referenced Action. On January 6, 2013, the Plaintiffs served Samsung Electronics America, Inc. ("Samsung"), via overnight mail, with the annexed Subpoena Duces Tecum, a document demand and deposition notice (collectively annexed hereto as **Exhibit A**). Samsung is a company with which Adorama, Inc. ("Adorama"), a Defendant in the Action, was enabled to become a retail partner and obtain profits arising from services performed by, and intellectual property stolen from, Alexander Interactive, Inc. ("AI"), as more fully set forth in the Second Amended Complaint.

On January 23, 2013, Samsung served a letter objection to the subpoena (annexed hereto as "**Exhibit B**") and delivered not a single document. Thereafter, the undersigned and Samsung's legal department engaged in meet and confer sessions and exchanged emails (collectively annexed hereto as "**Exhibit C**") in an attempt to resolve the discovery issues.

In Megan Drahos' April 23, 2013 email to the undersigned, Ms. Drahos represented that Samsung would look for and produce documents pursuant to delineations set forth in the undersigned's emails to Ms. Drahos. To date, not a single document has been produced.

Accordingly, Plaintiffs seek a discovery conference with the Court at its earliest convenience, as Fact Discovery closes in this Action on May 31, 2013.

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DATE FILED: 5-14-13

We look forward to hearing from the Court and thank you for your kind attention and consideration of this matter.

Respectfully,

*Denise L. Savage*  
Denise L. Savage

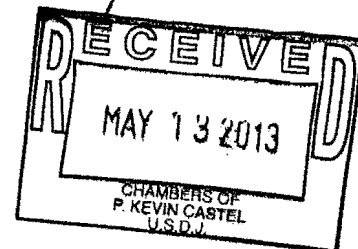
Encl.

Cc: Daniel Brown, Esq. (via email only)  
Ken Norwick, Esq. (via email only)  
Megan Drahos (via email only)

Ds/wj

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Counselors at Law

*Conference assigned for May 15 to May 23 at 2:30 p.m.*  
*(1) Samsung's counsel should for a letter to Chambers by May 17 regarding on the present state of its compliance with the subpoena.*  
*(2) Plaintiffs shall respond by May 21 with the reply for seeking well defined the appropriate relief.*  
*(3) for vs Samsung May 23. Thereafter, the court will determine relief.*  
*USDC 5-13-13*